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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

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IN RE:)	Case No.: 08-28960
)	Chapter 13
)	DCN: BLC-006
JEFFREY NEAL MCCOY &)	
VICTORIA N. MCCOY,)	Judge: Ronald H. Sargis
)	Date: November 19, 2013
Debtor(s).)	Time: 3:00 PM
)	Place: 501 "I" Street, 6 th Floor
Soc. Sec. No.: XXX-XX-6014)	Department E – Courtroom 33
)	
Soc. Sec. No.: XXX-XX-0573)	NOTICE OF HEARING TO
)	OBJECTION TO PRIORITY
)	CLAIM OF
)	COMMERCIAL TRADE, INC.,
)	CLAIM NO. 2

TO: THE HONORABLE UNITED STATES BANKRUPTCY COURT JUDGE:
THE UNITED STATES TRUSTEE; CHAPTER 13 TRUSTEE, DAVID CUSICK; AND TO
ALL OTHER INTERESTED PARTIES

PLEASE TAKE NOTICE that on November 19, 2013 at 3:00 P.M. or as soon thereafter
as the matter may be heard in Courtroom 33, Department E of this Court located at 501 "I"
Street, 6th Floor, Sacramento, California, Debtor(s), JEFFREY MCCOY AND VICTORIA

MCCOY, by and through their attorney of record, BRIAN L. COGGINS, will move this Court for an Order sustaining Objection to the Priority Claim of Commercial Trade, Inc.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Local Bankruptcy Rule 9014-1 (f) ((l) failure to file timely written opposition may result in the motion being resolved without oral argument and the striking of untimely written opposition. Opposition, if any, to the granting of the motion shall be in writing and shall be served and filed with the Court by the responding party at least fourteen (14) days preceding the date or continued date of the hearing.

Opposition shall be accompanied by evidence establishing its factual allegations. Without good cause, no party shall be heard in opposition to a motion at oral argument if written opposition to the motion has not been timely filed. Failure of the responding party to timely file written opposition may be deemed a waiver of any opposition to the granting of the motion may result in the imposition of sanctions.

The opposition shall specify whether the responding party consents to the Court's resolution of disputed material factual issues pursuant to Fed. R. Civ. P. 43(c) as made applicable by Fed. R. Bankr. P. 9017. If the responding party does not so consent, the opposition shall include a separate statement identifying each disputed material factual issue. The separate statement shall enumerate discretely each of the disputed material factual issues and cite the particular portions of the record demonstrating that a factual issue is both material and in dispute. Failure to file the separate statement shall be construed as consent to resolution of the motion and all disputed material factual issues pursuant to Fed. R. Civ. P. 43(c).

PLEASE TAKE FURTHER NOTICE THAT the deadline for filing and serving any written opposition is November 5, 2013.

PLEASE TAKE FURTHER NOTICE THAT any opposition must be served on the Debtor(s) attorney at the following address.

COGGINS LAW

9001 FOOTHILLS BOULEVARD, SUITE 110

ROSEVILLE, CA 95747

1 Said grounds will be supported by this notice of motion, by the motion filed herewith, by
2 the pleadings and papers on file in this bankruptcy case, by declaration in support of this motion
3 and exhibits, if any, filed herewith, and by such oral and documentary evidence as the Court may
4 permit upon the hearing of this motion. Not all information regarding the motion or the Debtors'
5 case is set forth in this motion, and interested parties are advised to review the court's file at the
6 Office of the Clerk, 501 "I" Street, Suite 3-200, Sacramento, CA 95814.

7 **YOUR RIGHTS MAY BE AFFECTED.** You should read these papers carefully and
8 discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an
9 attorney, you may wish to consult one.

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11 Dated: September 27, 2013

/s/ Brian L. Coggins

Brian, Coggins, Esq.

Coggins Law